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Defendants' request is untimely per Individual Rule I.B.2, but is nevertheless granted in part. The initial pretrial conference currently scheduled for May 13, 2021, is adjourned to **May 27, 2021, at 10:50 a.m.** The parties shall submit their joint letter and proposed Case Management Plan by **May 20, 2021**. Defendants shall answer or otherwise respond to the Complaint by **June 1, 2021**.

Dated: May 11, 2021  
New York, New York

May 11, 2021

**LORNA G. SCHOFIELD**  
UNITED STATES DISTRICT JUDGE

**ELECTRONICALLY FILED**

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Stichting Juridisch Eigendom De Veste Beleggingsfondsen v.  
Capstone Credit, LLC, Capstone Capital Group, LLC and  
Joseph F. Ingrassia, Case No. 21-cv-2102-LGS

Dear Judge Schofield:

This firm represents defendants in the above-referenced proceeding, and I have been asked to act as litigation counsel. I apologize for the failure to comply with the deadline imposed by the Court's Order of April 2 [ECF Doc. 10], and further apologize for approaching the Court with this request for adjournment only shortly before the deadline imposed by this Court's Order of May 7 [ECF Doc. 13]. However, to permit litigation counsel to become familiar with these matters and to coordinate with plaintiff's counsel on the joint letter and Case Management Plan, pursuant to Section I(B)(2) of this Court's Individual Rules and Procedures for Civil Cases, I hereby request a four-week adjournment of the initial pretrial conference currently scheduled for May 13, 2021 at 10:50 a.m. to June 10, 2021. There has been no previous request for adjournment of the conference. I understand that this constitutes a request for adjournment of the deadline most recently set by the Court's Order of May 7 with respect to a joint letter and Case Management Plan, such that these submissions would be filed no later than June 3, 2021. Plaintiff's counsel has consented to a two-week adjournment, but is not willing to agree to a four-week adjournment.

I also request adjournment of defendants' time to respond to the Complaint. I understand that service was effected on the entity defendants by service on the Secretary of State on April 21, such that their response is due on May 12. We have expressed willingness to accept service on the individual defendant as of May 10 and to respond on behalf of all defendants three weeks thereafter, that is, June 1. Before we agreed to accept service on the individual defendant, plaintiff's counsel agreed to a two-week adjournment for the response of the entity defendants, but is unwilling to agree to the further adjournment for these defendants for reasons I understand

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counsel will explain in a separate letter. We have not previously asked for extension of defendants' time to respond from the Court.

We thank the Court for considering these requests.

Respectfully submitted,



Kathy Hirata Chin

KHC:mls

cc: Albena Petrakov, Esq.  
Offit Kurman  
(via ECF)